

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Meyer Steel Drum, Inc.
3201 South Millard Avenue
Chicago, IL 60623**

ATTENTION:

Robert Conway, General Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Meyer Steel Drum, Inc. (MSDI or you) to submit certain information about the facility at 3201 South Millard Avenue, Chicago, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

MSDI owns and operates an emission source at the Chicago, Illinois facility. We are requesting this information to determine whether your emission source is complying with the Illinois State Implementation Plan and the National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products at 40 CFR Part 63 Subpart MMMM.

MSDI must send all required information to:

Attn: Compliance Tracker, AE-18J

Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

MSDI must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

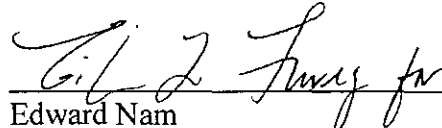
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject MSDI to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Manoj P. Patel at (312)353-3565 or by e-mail at patel.manojkumar@epa.gov.

3/3/18
Date


Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. *Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.*
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, *should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.*

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, *unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.*
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, and National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products at 40 C.F.R. Part 63, Subpart Mmmm.

1. The term “representative (normal) conditions” shall mean conditions that represent the range of combined process and control measure conditions under which the facility expects to operate (regardless of the frequency of the conditions); and are likely to most challenge the emissions control measures of the facility with regard to meeting the applicable emission standards, but without creating an unsafe condition. If operating at maximum capacity would result in the highest levels of emissions, operating at this level would not create an unsafe condition, and the facility expects to operate at that level at least some of the time, the facility should conduct a stack test at maximum capacity or the allowable/permitted capacity.

Appendix B

Information You Are Required to Submit to EPA

Meyer Steel Drum, Inc. (MSDI) must submit the following information requested for its Chicago operation (facility) located at 3201 South Millard Avenue, Chicago, Illinois, pursuant to Section 114 of the Clean Air Act (CAA or the Act), 42 U.S.C. § 7414, within thirty (30) calendar days from receipt of this letter. Provide the following information from the January 1, 2014 to the date you receive this request. Request 23 has separate deadlines that are set forth therein:

1. Provide a schematic diagram of the facility, depicting the overall process and submit a detailed narrative description of the processes employed at the facility to refurbish or recycle steel drums. For each piece of process equipment described, include its installation date.
2. Provide the number of drums (steel and plastic) received on a monthly and yearly basis from each open head and tight head process, in Microsoft Excel or other compatible format.
3. Provide the number of drums (steel and plastic) that are refurbished at the facility on a daily, weekly, monthly, and yearly basis, in Microsoft Excel or other compatible format.
4. Provide the average hourly rate of drums and the maximum hourly rate of drums processed through each open head and tight head process (i.e. wash line) on a monthly basis.
5. For the steel drum refurbishing and recycling operation(s) at the facility, provide a date and detailed description of any modification(s) to the process equipment.
6. Provide all documents related to the materials in the drums (steel and plastic) received by the facility, including, but not limited to:
 - a. Resource Conservation Recovery Act (RCRA) empty container certifications;
 - b. Hazardous waste manifests;
 - c. Technical data sheets;
 - d. Material safety data sheets; and
 - e. Analytical data on the materials.

7. Provide copies of all air quality permits issued by the Illinois Environmental Protection Agency (IEPA), Bureau of Air, including, but not limited to, Clean Air Act Permit Program (CAAPP) Permits¹, Permits to Install, or Construction Permits.
8. To the extent not provided in response to a request above, provide copies of any correspondence between the state, local, or federal permitting authority regarding the installation or modification of any emissions unit or the emission limits for any emissions unit at the facility, including, but not limited to, applicability determinations, regulatory interpretations, and approval orders.
9. Provide a detailed description of the type and amount of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) emitted by the facility, in pounds per hour and tons per year. Submit your response with the supporting information including but not limited to the air emissions calculations.
10. For each process at the facility emitting VOCs or HAPs, provide the actual hours of operation in hours per day, days per week, and hours per year.
11. Provide a list of all coatings used at the facility including the amount of each used weekly, monthly, and yearly.
12. Provide a list of all mix ratios for each coating used – as applied by the facility.
13. Provide copies of the results of any testing and/or sampling to determine the VOC or HAP content of coatings.
14. Provide a description of the steps taken by the Responsible Official to certify the truth, accuracy, and completeness of reports required by any applicable CAAPP Permit.
15. Provide current and previous copies of all Safety Data Sheets and Technical Data Sheets for all surface coatings, solvents, and thinners used at the facility.
16. Provide copies of all invoices for surface coatings, solvents, or thinners purchased and received by the facility.
17. Provide a list of all suppliers of surface coatings, solvents, and thinners.
18. Describe any procedures employed at the facility to prevent spillage, escape or emission of organic compounds from the handling, transportation, storage and disposal of VOC containing materials, including coatings, cleaning agents, and contaminated rags.
19. Provide the following records for the regenerative thermal oxidizer (RTO) at the facility:

¹ This information request references conditions in the CAAPP permit EPA believes to be in effect for your facility, number 95120079 issued on July 20, 2005.

- a. A list of emission units and or equipment whose air emissions are ducted to the RTO;
 - b. Operating records for the RTO showing how many hours each day the RTO operates; and
 - c. Copies of records of temperatures for the RTO with hourly average.
20. Provide the following information, which you are required to maintain under the recordkeeping requirements found at Condition 7.1.9 of your CAAPP Permit. Submit the following information for each day of the time period identified above for each of the following coating lines at the facility: Interior Coating Line #1, Primer Coating Line #2, Exterior Coating Line #3, Interior Coating Line #4, Exterior Coating Line #5, Exterior Coating Line #65, and Ring Dip Coating Line #7:
- a. The name and identification number of each coating as applied on each coating line;
 - b. The usage of each coating, in units of gallons/month and gallons/year;
 - c. The weight of VOC per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOC) as applied each month on each coating line;
 - d. Density of each applied coating and clean up solvent, in units lb./gal;
 - e. The usage of clean-up solvent, in units of gallons/month and gallons/year;
 - f. The amount of manifested waste sent off site for reclamation or disposal, in units gallons/month and gallons/year;
 - g. The average density in lb./gal and wt% (or lb./gal) of VOC/HAP in the manifested waste;
 - h. Total VOC/HAP emissions in tons/month and tons/year from affected coating line calculated based on the recordkeeping requirements and compliance procedures found at Condition 7.1.12 of your CAAPP Permit;
 - i. Records of the testing of VOC and HAP content of each coating and cleaning solvent as tested, which includes the following:
 - A. Identification of material tested;
 - B. Results of analysis;
 - C. Documentation of analysis methodology; and
 - D. Person performing analysis.

- j. Maintenance log of air pollution control device (s) inspections and all necessary repairs being performed with dates of certain actions taken.
21. Provide the following information, which you are required to maintain under the recordkeeping requirements found at Condition 7.2.9 of your CAAPP Permit. Submit the following information for each day of the time period identified above for Natural Gas-Fired Drum Reclamation Furnace DRF-1:
- a. The afterburner combustion temperature during the time of operation of the Furnace;
 - b. Number of drums charged into the furnace (drum/hour and drums/year);
 - c. Inspection maintenance logs for the drum reclamation furnace and after burner, with all necessary repairs being performed with dates of certain maintenance actions taken; and
 - d. Operating hours of the drum reclamation furnace (hours/year).
22. Provide the following information, which you are required to maintain under the recordkeeping requirements found at Condition 7.1.9(k) of the CAAPP Permit Application No. 95120079, which references 40 C.F.R. Part 63, Subpart MMMM. Submit the following information for each day of the time period identified above for each of the following coating lines at the facility: Interior Coating Line #1, Primer Coating Line #2, Exterior Coating Line #3, Interior Coating Line #4, Exterior Coating Line #5, Exterior Coating Line #65, and Ring Dip Coating Line #7:
- a. A copy of each notification and report that the facility submitted to comply with 40 C.F.R. Part 63, Subpart MMMM, and the documentation supporting each notification and report;
 - b. A current copy of information provided by material suppliers or manufacturers, such as manufacturer's formulation data, or test data, including summary sheets, used to determine the mass fraction of organic HAP and density for each coating, thinner and other additive, and cleaning material, and the volume fraction of coating solids for each coating;
 - c. If you conducted testing to determine mass fraction of organic HAP, density or volume fraction of coating solids, provide copy of the complete test report(s);
 - d. Records of the calculation of the organic HAP content for each coating, using Equation 2 of 40 C.F.R. § 63.3941;
 - e. A records of the name and volume (or purchase records, if applicable) of each coating, thinner and other additive, and cleaning material used;

- f. A record of the mass fraction of organic HAP for each coating, thinner and other additive, and cleaning material used;
 - g. A record of the volume fraction of coating solids for each coating used;
 - h. If you used the emission rate without add-on controls compliance option, provide records showing the density for each coating, thinner, other additive, and cleaning material used; and
 - i. If you used the emission rate without add-on controls compliance option and the calculation includes an allowance for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF), provide records of:
 - A. The name and address of each TSDF;
 - B. The date of each shipment;
 - C. Identification of coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these waste materials when calculating the emission rate; and
 - D. The methodology used to determine total amount of waste materials sent to or the amount collected, stored and designated for transport to a TSDF each month and the methodology used to determine the mass of organic HAP contained in these waste materials.
 - j. Records of the date, time and duration of each deviation.
23. MSDI shall submit an emission test protocol, conduct emission testing, and submit all other information requested within the schedules provided below for the facility. Specifically, MSDI shall:
- a. Within 30 days of receipt of this request, submit a proposed emission testing protocol to measure VOC emissions from the drums interior and exterior washing operations and 12 stage drum flusher. This emission testing must be conducted in accordance with U.S. EPA Method 1 through 4, and Method 25 or Method 25A and Method 204. The emission test protocol shall specify the following:
 - A. All VOC emissions from the drums interior and exterior washing operations and 12 stage drum flusher must be routed to the wet scrubber vent and the 12 stage flush vents during the test, as demonstrated using Method 204; if all emissions are currently not being vented to these vents, MSDI shall construct temporary total enclosure (TTE) for each emission unit;

- B. Three sampling runs will be conducted at each emission unit. Each run shall be at least one hour long; and
 - C. Testing will be conducted at a production rate and process operating conditions that are consistent with representative (normal) conditions.
- b. Within 30 days of receipt of this request, submit a proposed emission testing protocol to quantify the particulate matter less than ten microns (PM₁₀) and VOC mass emission rates from the Natural Gas-Fired Drum Reclamation Furnace DRF-1. This emission testing must be conducted in accordance with U.S. EPA Method 1 through 4, Method 5, and Method 25 or 25A in pounds per hour. The emission test protocol shall specify the following:
- A. Three sampling runs will be conducted at each emission unit. Each run shall be at least one hour long; and
 - B. Testing will be conducted at a production rate and process operating conditions that are consistent with representative (normal) conditions.
- c. Within 65 days of your receipt of this request, complete the emission tests in accordance with the approved testing protocols submitted per Request 23.a. and b. In advance of the tests, MSDI must obtain approval from EPA on the testing and make any adjustments to the protocols required by EPA.
- d. At least 15 days prior to the planned emission test(s) under Request 23.c., submit notification to EPA via email (patel.manojkumar@epa.gov and R5airenforcement@epa.gov) and to Illinois EPA of the intent to perform emission testing.
- e. Between the date of this request and the date of the emission test(s) required above, MSDI shall only perform routine maintenance on the wet scrubber/mist eliminator. Any maintenance that is performed must be documented in the stack test report required in item f. below; and
- f. Within 30 days after completion of those tests, submit a complete report of the emission test(s), including the following, at a minimum:
- A. Summary of Results
 - i. Results of the above specified emission tests (ppm, lbs/hr);
 - ii. Process and control equipment data related to determining compliance;
 - iii. Discussion of any test errors;
 - iv. Discussion of any deviations from the reference test methods; and
 - v. Production data.

B. Facility Operations

- i. Description of the process in operation;
- ii. Operating parameters of the process at the time of the test, including but not limited to line speed, type of waste liquid container washed or rinsed or processed, amount of waste liquid in the containers, name of waste liquid in each container, pressure drop across the scrubber, the liquid flow rate in gallons per minutes across the scrubber, the scrubber liquid pH; and
- iii. Facility operating parameters that demonstrate that the facility was being operated at representative (normal) conditions.

C. Sampling and Analytical Procedures

- i. Sampling port location(s) and dimensions of cross-section;
- ii. Sampling point description, including labeling system;
- iii. Brief description of sampling procedures, including equipment and diagram;
- iv. Description of sampling procedures (planned and accidental) that deviated from any standard method;
- v. Brief description of analytical procedures, including calibration;
- vi. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
- vii. Quality control/ quality assurance procedures, tests, and results.

D. Appendix

- i. Complete results with example calculations;
- ii. Raw field data (original, not computer printouts);
- iii. Laboratory report, with signed chain-of-custody forms;
- iv. Calibration procedures and results;
- v. Raw process and control equipment data, signed by plant representative;
- vi. Test log;
- vii. Project participants and titles; and
- viii. Related correspondence.

In addition to the submittal requirements described on page 1 and 2 of this Information Request, MDSI shall submit information requested in Request 23 by electronic mail to: Patel.Manojkumar@epa.gov and R5airenforcement@epa.gov.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

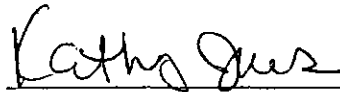
Robert Conway, General Manager
Meyer Steel Drum, Inc.
3201 South Millard Avenue
Chicago, Illinois 60623

I also certify that I sent a copy of the Request to Provide Information Pursuant to the

Clean Air Act by E-mail to:

Julie Armitage, Chief,
Bureau of Air, Illinois Environmental Protection
Agency
Julie.Armitage@Illinois.gov

On the 30th day of March 2018.



Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7641 3336